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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHN PRUTSMAN, AMIRA MARTZ,
SIMCHA RINGEL, NAIOMI MARDEN,
ALANA BALAGOT, CORINNE
WARREN, SUNNY LAI, AND DAVID
KLEIN, individually, and on behalf of all
others similarly situated,

Plaintiffs,
vs.

NONSTOP ADMINISTRATION AND
INSURANCE SERVICES, INC., Inclusive,

Defendant.

CASE NO. 3:23-CV-01131-RFL

**STIPULATION RE: PROPOSED
EXTENSION OF TIME TO FILE CLASS
CERTIFICATION PRIMARY EXPERT
DISCLOSURE AND AMEND PLEADINGS;
[PROPOSED] ORDER**

Judge: Hon. Rita F. Lin

STIPULATION RE: PROPOSED EXTENSION OF TIME TO FILE CLASS CERTIFICATION
PRIMARY EXPERT DISCLOSURE AND AMEND PLEADINGS; [PROPOSED] ORDER

1 Pursuant to Civil Local Rule 6-1(b), Plaintiffs John Prutsman, Amira Martz, Simcha
2 Ringel, Naomi Marden, Alana Balagot, Corrine Warren Sunny Lai, and David Klein, (hereinafter
3 “Plaintiffs”), and Defendant Nonstop Administration and Insurance Services, Inc., (hereinafter
4 “Defendant” or “Nonstop”), collectively referred to as “the Parties”, hereby stipulate to extend the
5 Case Management Schedule, and in support thereof state as follows:

6 **WHEREAS**, on March 14, 2023, Plaintiff Prutsman filed a Complaint (ECF No. 1), and
7 several related actions were thereafter filed (the “Related Actions”);

8 **WHEREAS**, on May 4, 2023, this Court granted Plaintiffs’ Motion to Consolidate the
9 Related Actions (ECF No. 26);

10 **WHEREAS**, on May 25, 2023, Plaintiffs filed their Consolidated Amended Class Action
11 Complaint (ECF No. 38);

12 **WHEREAS**, on June 15, 2023, Defendant filed its Motion to Dismiss Plaintiffs’ Amended
13 Class Action Complaint (ECF No. 39);

14 **WHEREAS**, on August 16, 2023, this Court issued its Order Granting in Part and Denying
15 in Part the Motion to Dismiss (ECF No. 54);

16 **WHEREAS**, on January 24, 2024, this Court held a Case Management Conference and set
17 a case schedule, up to and including the December 17, 2024 hearing date for Plaintiffs’ Motion for
18 Class Certification. (ECF No. 74). The Court further set the deadline to complete ADR as May 31,
19 2024. *Id.*;

20 **WHEREAS**, on February 12, 2024, the Parties stipulated to extend each of the non-ADR
21 deadlines an additional 120 days to allow the Parties to engage in private mediation without
22 incurring additional time or expense, and while conserving judicial resources (ECF No. 78). The
23 Court granted that stipulation, (ECF No. 80) and extended the ADR deadline to July 31, 2024
24 (ECF No. 81.).

25 **WHEREAS**, the Parties have a mediation set for June 6, 2024, with Class Certification
26 Primary Expert Disclosures due May 13, 2024, and the last day to amend the pleadings as May 20,
27 2024;

28 STIPULATION RE: PROPOSED EXTENSION OF TIME TO FILE CLASS CERTIFICATION
PRIMARY EXPERT DISCLOSURE AND AMEND PLEADINGS; [PROPOSED] ORDER

1 **WHEREAS**, the Parties are requesting that the deadline to submit Class Certification
2 Primary Expert Disclosures and the deadline to amend the pleadings be extended by approximately
3 60 days to allow the Parties to engage in private mediation without incurring additional time or
4 expense.

5 **WHEREAS**, the requested enlargement of time will allow the Parties to devote their time
6 and resources to discuss a potential resolution of the Consolidated Actions;

7 **NOW THEREFORE**, subject to the Court's approval and Order, it is stipulated by and
8 between the Parties, through their respective counsel of record, that the deadlines be enlarged by
9 60 days as follows:

	Event	Original Deadline	Enlarged Deadline
10	Class Certification Primary Expert Disclosures	5/13/2024	7/12/24
11	Last Day to Amend the Pleadings	5/20/2024	7/19/24
12			

Dated: April 25, 2024

COLE & VAN NOTE

By: /s/ Scott Edward Cole
Scott Edward Cole, Esq.

Dated: April 25, 2024

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

By: /s/ Gary M. Kilnger
Gary M. Klinger, Esq.

Plaintiffs' Interim Co-Lead Class Counsel

23 | Dated: April 25, 2024

CIPRIANI & WERNER PC

By: /s/ Jill Fertel
Jill H. Fertel, Esq.

Counsel for Defendant

**STIPULATION RE: PROPOSED EXTENSION OF TIME TO FILE CLASS CERTIFICATION
PRIMARY EXPERT DISCLOSURE AND AMEND PLEADINGS; [PROPOSED] ORDER**

ORDER

THE PARTIES HAVING STIPULATED, AND GOOD CAUSE APPEARING, the Court hereby enters its Order extending the Case Management Deadlines as follows:

Class Certification Primary Expert Disclosures due by July 12, 2024;
Deadline to amend the pleadings is July 19, 2024.

Dated: _____, 2024

Dated: _____, 2024

Hon. Rita F. Lin
United States District Court for the Northern
District of California

CERTIFICATE OF SERVICE

I hereby certify that, on April 26, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served today on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF and on counsel in the related cases to their respective emails per the below service list.

/s/ Scott Edward Cole
Scott Edward Cole, Esq.